

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 19**

STARBUCKS CORPORATION

and

**WORKERS UNITED LABOR UNION
INTERNATIONAL, affiliated with SERVICE
EMPLOYEES INTERNATIONAL UNION**

**Cases 01-CA-305952
02-CA-304557
03-CA-295541
03-CA-295542
03-CA-304496
03-CA-305874
03-CA-308072
03-CA-308087
05-CA-306073
06-CA-304556
06-CA-305945
07-CA-305994
08-CA-305978
09-CA-306006
10-CA-304520
10-CA-305937
12-CA-306060
13-CA-306406
14-CA-305924
15-CA-305997
18-CA-304544
18-CA-306065
20-CA-306021
22-CA-304521
22-CA-305933
25-CA-304571
27-CA-305876
29-CA-304624
32-CA-306196**

**ORDER CONSOLIDATING CASES, CONSOLIDATED
COMPLAINT AND NOTICE OF HEARING**

Pursuant to § 102.33 of the Rules and Regulations of the National Labor Relations Board (the "Board") and to avoid unnecessary costs and delay, IT IS ORDERED THAT Cases 01-CA-305952, 02-CA-304557, 03-CA-295541, 03-CA-295542, 03-CA-304496,

03-CA-305874, 03-CA-308072, 03-CA-308087, 05-CA-306073, 06-CA-304556, 06-CA-305945, 07-CA-305994, 08-CA-305978, 09-CA-306006, 10-CA-304520, 10-CA-305937, 12-CA-306060, 13-CA-306406, 14-CA-305924, 15-CA-305997, 18-CA-304544, 18-CA-306065, 20-CA-306021, 22-CA-304521, 22-CA-305933, 25-CA-304571, 27-CA-305876, 29-CA-304624, and 32-CA-306196, which are based on charges against Starbucks Corporation (“Respondent”) filed by Workers United Labor Union International, affiliated with Service Employees International Union, herein identified by its proper legal name, on behalf of itself or one of its joint board affiliates (collectively, the “Union”), are consolidated.

This Order Consolidating Cases, Consolidated Complaint and Notice of Hearing, which is based on these charges, is issued pursuant to § 10(b) of the National Labor Relations Act (the “Act”), 19 U.S.C. § 151 *et seq.*, and § 102.15 of the Board’s Rules and Regulations, and alleges that Respondent has violated the Act as described below.

1.

The charges in this consolidated matter were filed by the Union and served upon the Respondent by U.S. mail on about the dates indicated:

CASE NO.	TYPE OF CHARGE	DATE FILED	DATE SERVED
01-CA-305952	Original	October 25, 2022	October 26, 2022
02-CA-304557	Original	October 4, 2022	October 4, 2022
02-CA-304557	Amended	October 27, 2022	November 10, 2022
03-CA-295541	Original	May 10, 2022	May 11, 2022
03-CA-295542	Original	May 10, 2022	May 11, 2022
03-CA-304496	Original	October 4, 2022	October 4, 2022

CASE No.	TYPE OF CHARGE	DATE FILED	DATE SERVED
03-CA-304496	Amended	October 27, 2022	October 28, 2022
03-CA-305874	Original	October 25, 2022	October 25, 2022
03-CA-308072	Original	December 1, 2022	December 2, 2022
03-CA-308087	Original	December 1, 2022	December 2, 2022
05-CA-306073	Original	October 25, 2022	October 28, 2022
06-CA-304556	Original	October 3, 2022	October 4, 2022
06-CA-304556	Amended	November 4, 2022	November 8, 2022
06-CA-305945	Original	October 25, 2022	October 26, 2022
06-CA-305945	Amended	January 9, 2023	January 11, 2023
07-CA-305994	Original	October 25, 2022	October 27, 2022
08-CA-305978	Original	October 25, 2022	October 27, 2022
09-CA-306006	Original	October 25, 2022	October 27, 2022
10-CA-304520	Original	October 3, 2022	October 4, 2022
10-CA-304520	Amended	November 4, 2022	November 7, 2022
10-CA-305937	Original	October 26, 2022	October 26, 2022
12-CA-306060	Original	October 25, 2022	October 28, 2022
13-CA-306406	Original	November 2, 2022	November 3, 2022
14-CA-305924	Original	October 25, 2022	October 26, 2022
15-CA-305997	Original	October 27, 2022	October 27, 2022
18-CA-304544	Original	October 3, 2022	October 4, 2022
18-CA-304544	Amended	November 4, 2022	November 7, 2022
18-CA-306065	Original	October 25, 2022	October 28, 2022
18-CA-306065	Amended	January 9, 2023	January 11, 2022

CASE No.	TYPE OF CHARGE	DATE FILED	DATE SERVED
20-CA-306021	Original	October 25, 2022	October 27, 2022
22-CA-304521	Original	October 3, 2022	October 4, 2022
22-CA-304521	Amended	October 27, 2022	November 4, 2022
22-CA-305933	Original	October 25, 2022	October 26, 2022
25-CA-304571	Original	October 3, 2022	October 5, 2022
25-CA-304571	Amended	November 4, 2022	November 7, 2022
27-CA-305876	Original	October 25, 2022	October 25, 2022
29-CA-304624	Original	October 5, 2022	October 5, 2022
29-CA-304624	Amended	October 28, 2022	October 31, 2022
32-CA-306196	Original	October 25, 2022	October 31, 2022

2.

(a) At all material times, Respondent has been a Washington corporation headquartered in Seattle, Washington, and has been engaged in operating over 17,000 public restaurants selling food and beverages throughout the United States, including the following facilities (the “facilities”), identified by Respondent’s store numbers:

STORE	LOCATION
#23642	308 20th St South, Suite 100, Birmingham, AL
#05650	4833 Candlewood St, Lakewood, CA
#09382	3390 E 7th St, Long Beach, CA
#20587	745 Ocean Street, Santa Cruz, CA
#53811	1909 Mission Street, Santa Cruz, CA
#06557	138 S Central Ave, Los Angeles, CA
#00667	1955 41st Avenue, Capitola, CA
#54260	131 East Katella Ave., Suite 10, Anaheim, CA

STORE	LOCATION
#19311	1570 South Disneyland Dr, Suite 105, Anaheim, CA
#05406	2224 Shattuck Ave., Berkeley, CA
#09212	4094 18th Street, San Francisco, CA
#55230	3241 N. Figueroa St, Los Angeles, CA
#05577	6066 W. Olympic Blvd., Los Angeles, CA
#05524	2489 Lenwood Blvd, Barstow, CA
#07740	1449B New Britain Ave, West Hartford, CT
#27448	135 Talcottville Rd, Vernon, CT
#06919	2604 11th Avenue, Greeley, CO
#06392	4465 Centennial Blvd, Colorado Springs, CO
#00237	250 Columbine St, Denver, CO
#08804	1703 W. Tennessee Street, Tallahassee, FL
#08552	2264-1 North Monroe St, Tallahassee, FL
#08395	1980 San Marco Blvd, Jacksonville, FL
#11715	52 Curtiss Pkwy, Miami Springs, FL
#21922	11441 San Jose Blvd, Jacksonville, FL
#26676	305 E Mitchell Hammock, Oviedo, FL
#11118	228 Robert C. Daniel Parkway, Augusta, GA
#10903	1801 Howell Mill Rd, Atlanta, GA
#08358	1544 Piedmont Rd NE #232, Atlanta, GA
#59412	1025 E Main St., Carbondale, IL
#08919	1200 West Main St, Peoria, IL
#29259	620 Northwest Hwy, Cary, IL
#47631	5964 N Ridge Ave, Chicago, IL
#02827	1174 E 55th St, Chicago, IL
#14256	2101 W Armitage Ave, Chicago, IL
#10368	3001 North Perryville Road, Rockford, IL

STORE	LOCATION
#02929	6075 N. Lincoln Ave., Chicago, IL
#28174	1231 Veterans Parkway, Clarksville, IN
#09982	3401 Bardstown Rd, Louisville, KY
#23154	12911 Factory Lane, Louisville, KY
#48490	360 Alfred St, Biddeford, ME
#11685	1209 N Charles St, Baltimore, MD
#14168	1700 W. Nursery Road, Linthicum Heights, MD
#11916	5350 Campbell Blvd A, Nottingham, MD
#09835	16806 Georgia Ave., Olney, MD
#55069	450 Thompson Creek Road, Stevensville, MD
#22914	563 Baltimore Pike, Bel Air, MD
#07702	874 Commonwealth Ave., Brookline, MA
#00867	277 Harvard St, Brookline, MA
#22253	1304 Commonwealth Ave, Boston, MA
#16439	1948 Beacon St, Brighton, MA
#08742	120 Broadway, Cambridge, MA
#11728	5655 Pickard Road, Mount Pleasant, MI
#48198	2480 Burton St SE, Grand Rapids, MI
#02359	222 S. State St., Ann Arbor, MI
#08793	300 S. Main St., Ann Arbor, MI
#23127	120 South Zeeb Rd., Ann Arbor MI
#11517	1141 E. Grand River Avenue, East Lansing, MI
#24961	5122 Edina Industrial Blvd, Edina, MN
#65228	300 Snelling Ave Suite C, Saint Paul MN
#49134	4712 Cedar Ave, Minneapolis, MN
#48827	3704 Silver Lake Rd NE, St. Anthony, MN
#02705	164 E Broadway, Bloomington, MN

STORE	LOCATION
#02209	2305 Fairview Avenue, Roseville, MN
#07945	3700 S. Kingshighway Blvd, St. Louis, MO
#07995	1500 S Lindbergh Blvd, Des Peres, MO
#10563	922 Meramec Station Road, Valley Park, MO
#63259	1216 Hampton Ave., St. Louis, MO
#07853	800 A Denow Rd, Pennington, NJ
#13856	40 South Park St, Montclair, NJ
#07226	2 Beechwood Rd, Summit, NJ
#08964	1081 Whitehorse Mercerville Rd, Hamilton Twp, NJ
#07381	933 Elmwood Ave, Buffalo, NY
#23917	4255 Genesee St, Cheektowaga, NY
#07665	4770 Transit Rd, Depew, NY
#47843	3186 Sheridan Dr, Amherst, NY
#07448	235 Delaware Avenue, Buffalo, NY
#07657	2750 Monroe Ave, Rochester, NY
#10395	130 E Seneca St, Ithaca, NY
#11932	402 College Ave Suite 402, Ithaca, NY
#65187	722 South Meadow Street, Ithaca NY
#47906	61 9th Ave, New York, NY
#07310	1394 Mt Hope Ave., Rochester, NY
#07307	4301 Merrick Rd, Massapequa, NY
#23267	8973 Bay Pkwy, Brooklyn, NY
#23901	1210 Troy Schenectady Rd., Latham, NY
#00825	13-25 Astor Pl, New York, NY
#50060	3015 Niagara Falls Boulevard, Amherst, NY
#07363	2303 Nott Street East, Niskayuna, NY
#07664	309 Clifton Park Center Road, Clifton Park, NY

STORE	LOCATION
#11064	1 Crossgates Mall Road, B231, Albany, NY
#10750	9660 Transit Road, East Amherst, NY
#47390	1700 Blowing Rock Rd, Boone, NC
#57458	7201 Market Street, Wilmington, NC
#02367	88 E Broad St, Columbus, OH
#02390	1374 W. 6th St, Cleveland, OH
#47472	269 Main Street, Westlake, OH
#02208	401 Vine St, Cincinnati, OH
#02618	3093 Mayfield Road, Cleveland Heights, OH
#10208	11302 Euclid Ave., Cleveland, OH
#03409	495 West 7th Avenue, Eugene, OR
#25591	1395 University St, Eugene, OR
#27299	1895 Franklin Blvd, Eugene, OR
#09992	4080 Washington Road, McMurray, PA
#07749	4765 Liberty Ave, Pittsburgh, PA
#27117	4022 Fifth Ave, Pittsburgh, PA
#00775	3401 Walnut St, Philadelphia, PA
#08846	1900 Market St. Philadelphia, PA
#09536	600 S 9th St, Philadelphia, PA
#00784	7 Market Square, Pittsburgh, PA
#25384	3400 Civic Center Blvd, Philadelphia, PA
#00793	1400 E Carson St, Pittsburgh, PA
#07284	3464 William Penn Hwy, Pittsburgh, PA
#10521	5932 Penn Circle South, Pittsburgh, PA
#10407	1128 Walnut St, Philadelphia, PA
#02900	425 Craig Street, Pittsburgh, PA
#28845	4655 William Flynn Hwy, Pittsburgh, PA

STORE	LOCATION
#07625	5310 Liberty Ave., Pittsburgh, PA
#19816	7707 McKnight Rd, Pittsburgh, PA
#56069	4686 Clemson Blvd., Anderson, SC
#10525	3905 Pelham Rd., Greenville, SC
#63059	3009 Millwood Ave. Suite 100, Columbia, SC
#11655	7803 Montvue Center Way, Knoxville, TN
#09780	116 Merchant Dr, Knoxville, TN
#08345	3388 Poplar Ave, Memphis, TN
#11293	121 Cusick Rd, Alcoa, TN
#05658	421 E 400 S, Salt Lake City, UT
#03473	580 Shelburne Road #9, South Burlington, VT
#00724	1601 Willow Lawn Dr #700-P, Richmond, VA
#07757	11136 Midlothian Tpk, North Chesterfield, VA
#07856	6980 Forest Hill Ave, Richmond, VA
#07857	2059 Huguenot Rd., Richmond, VA
#13674	15605 WC Commons Way, Midlothian, VA
#07321	3046 Gatehouse Plaza, Falls Church, VA
#07423	526 East Market Street, Leesburg, VA
#61778	2003 S. Main St, Farmville, VA
#09316	1340 Oyster Point Rd, Newport News, VA
#22002	8 Old Whitmore Ave., Roanoke, VA,
#07264	3555 West Cary St., Richmond, VA
#23129	1017 North Arthur Ashe Blvd, Richmond, VA
#00717	210-21 Southbank Street, Sterling, VA
#60580	425 Pike St., Seattle, WA
#10795	315 Cooper Point Rd. NW Unit 101 Olympia, WA
#11159	5300 Capitol Blvd SE Tumwater, WA

STORE	LOCATION
#28855	814 Iowa St., Bellingham, WA
#02425	1 East Main Street, Madison, WI
#09379	631 W. Northland Ave., Appleton, WI

(b) In conducting its business operations described above in paragraph 2(a) during the last 12 months, which period is representative of all material times, Respondent derived gross revenues in excess of \$500,000.

(c) In conducting its business operations described above in paragraph 2(a) during the last 12 months, which period is representative of all material times, Respondent purchased and received goods in the State of Washington valued in excess of \$50,000 directly from points located outside the State of Washington.

(d) At all material times, Respondent has been an employer engaged in commerce within the meaning of §§ 2(2), (6), and (7) of the Act.

3.

(a) At all material times, the Union has been a labor organization within the meaning of § 2(5) of the Act.

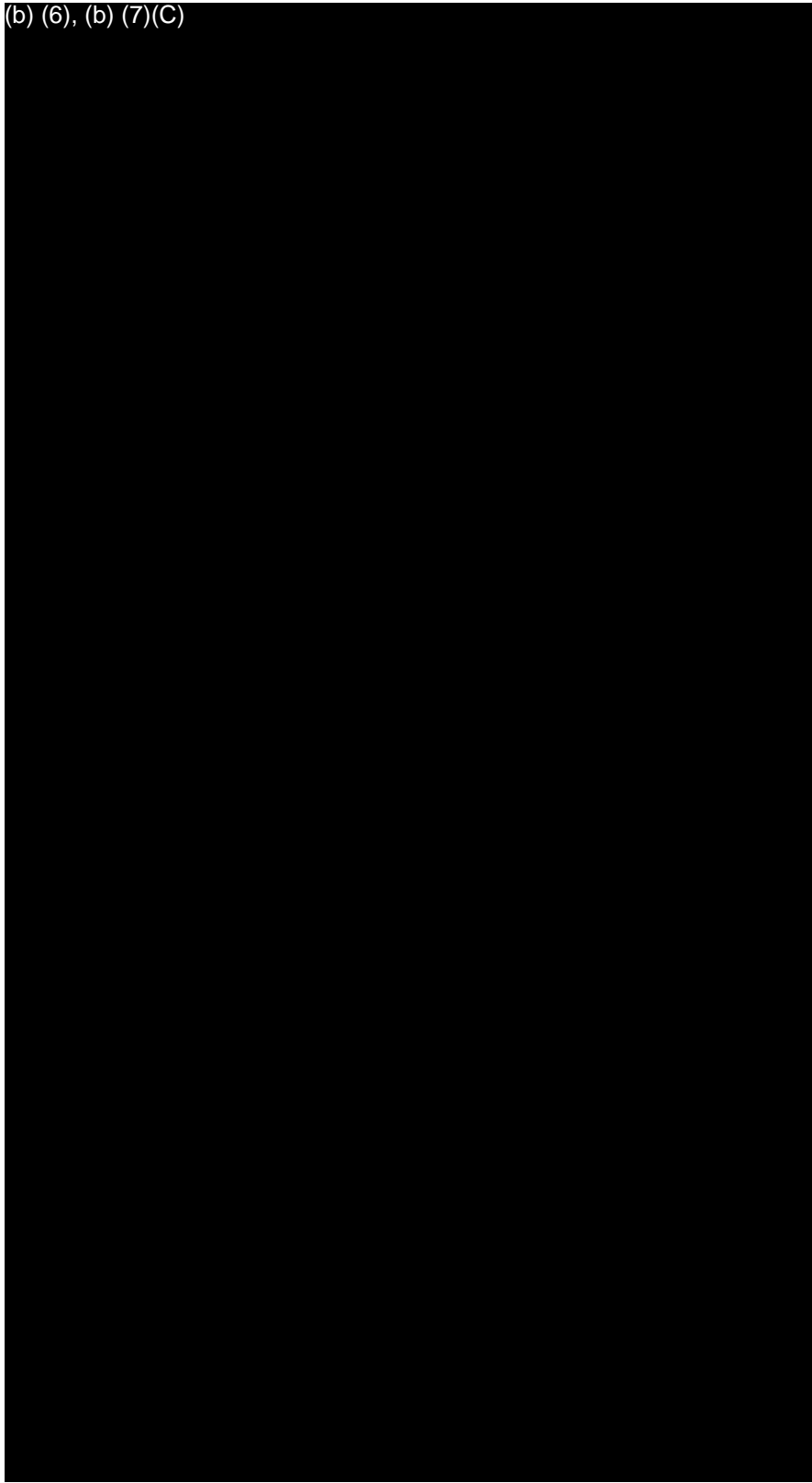
(b) At all material times, each joint board affiliate of the Union, including Chicago Midwest Regional Joint Board, Mid-Atlantic Regional Joint Board, Rochester Regional Joint Board, have been labor organizations within the meaning of § 2(5) of the Act.

4.

At all material times, the following individuals held the positions set forth opposite their respective names and have been supervisors of Respondent within the meaning

of § 2(11) of the Act and/or agents of Respondent within the meaning of § 2(13) of the Act, acting on Respondent's behalf:

(b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)

Unnamed Agent – Corporate Counsel, Labor and Employment

Unnamed Agents – Outside Attorneys

5.

(a) The following employees of Respondent at each of the facilities listed in paragraph 2(a) above constitute separate single-store units (collectively, the “Units”) appropriate for the purposes of collective bargaining within the meaning of § 9(b) of the Act:

All full-time and regular part-time baristas and shift supervisors employed by Respondent at each of the facilities listed herein; but excluding all store managers, office clericals, confidential employees, managerial employees, and all other employees, professional employees, and guards and supervisors as defined in the Act.

(b) On various dates from December 17, 2021, through September 29, 2022, representation elections were conducted among the employees in the Units and the Union was certified as the exclusive collective bargaining representative of each Unit at the corresponding store on the dates set forth below.

STORE	LOCATION	CERTIFICATION DATE
#07381	933 Elmwood Ave, Buffalo, NY	December 17, 2021
#23917	4255 Genesee St, Cheektowaga, NY	January 10, 2022
#07665	4770 Transit Rd, Depew, NY	March 17, 2022
#47843	3186 Sheridan Dr, Amherst, NY	March 17, 2022
#09780	116 Merchant Dr, Knoxville, TN	April 5, 2022
#47906	61 9th Ave, New York, NY	April 12, 2022
#07448	235 Delaware Avenue, Buffalo, New York	April 15, 2022
#07657	2750 Monroe Ave, Rochester, NY	April 15, 2022
#10395	130 E Seneca St, Ithaca, NY	April 18, 2022
#11932	402 College Ave Suite 402, Ithaca, NY	April 18, 2022

STORE	LOCATION	CERTIFICATION DATE
#65187	722 South Meadow Street, Ithaca NY	April 18, 2022
#07749	4765 Liberty Ave, Pittsburgh, PA	April 21, 2022
#00867	277 Harvard St, Brookline, MA	April 22, 2022
#22253	1304 Commonwealth Ave, Boston, MA	April 22, 2022
#07310	1394 Mt Hope Ave., Rochester, NY	April 26, 2022
#00724	1601 Willow Lawn Dr #700-P, Richmond, VA	April 28, 2022
#07757	11136 Midlothian Tpk, North Chesterfield, VA	April 28, 2022
#07856	6980 Forest Hill Ave, Richmond, VA	April 28, 2022
#07857	2059 Huguenot Rd., Richmond, VA	April 28, 2022
#13674	15605 WC Commons Way, Midlothian, VA	April 28, 2022
#07321	3046 Gatehouse Plaza, Falls Church, VA	May 3, 2022
#07423	526 East Market Street, Leesburg, VA	May 3, 2022
#07853	800 A Denow Rd, Pennington, NJ	May 4, 2022
#08919	1200 West Main St, Peoria, IL	May 4, 2022
#29259	620 Northwest Hwy, Cary, IL	May 4, 2022
#65228	300 Snelling Ave Suite C, Saint Paul MN	May 4, 2022
#03409	495 West 7th Avenue, Eugene, OR	May 6, 2022
#25591	1395 University St, Eugene, OR	May 6, 2022
#27117	4022 Fifth Ave, Pittsburgh, PA 15213	May 6, 2022
#27299	1895 Franklin Blvd, Eugene, OR	May 6, 2022
#00825	13-25 Astor Pl, New York, NY	May 9, 2022
#10795	315 Cooper Point Rd. NW Unit 101 Olympia, WA	May 9, 2022
#11118	228 Robert C. Daniel Parkway, Augusta, GA	May 9, 2022
#49134	4712 Cedar Ave, Minneapolis MN	May 9, 2022
#07226	2 Beechwood Rd, Summit, NJ	May 10, 2022
#08964	1081 Whitehorse Mercerville Rd, Hamilton Twp, NJ	May 10, 2022
#47390	1700 Blowing Rock Rd, Boone, NC	May 10, 2022

STORE	LOCATION	CERTIFICATION DATE
#07307	4301 Merrick Rd, Massapequa, NY	May 11, 2022
#16439	1948 Beacon St, Brighton, MA	May 11, 2022
#23267	8973 Bay Pkwy, Brooklyn, NY	May 11, 2022
#08552	2264-1 North Monroe St, Tallahassee, FL	May 13, 2022
#11685	1209 N Charles St, Baltimore, MD	May 16, 2022
#14168	1700 W. Nursery Road, Linthicum Heights, MD	May 18, 2022
#61778	2003 S. Main St, Farmville, VA	May 18, 2022
#08395	1980 San Marco Blvd, Jacksonville, FL	May 20, 2022
#11715	52 Curtiss Pkwy, Miami Springs, FL	May 20, 2022
#21922	11441 San Jose Blvd, Jacksonville, FL	May 20, 2022
#48198	2480 Burton St SE, Grand Rapids, MI	May 23, 2022
#05650	4833 Candlewood St, Lakewood, CA	May 24, 2022
#09382	3390 E 7th St, Long Beach, CA	May 24, 2022
#20587	745 Ocean Street, Santa Cruz, CA	May 24, 2022
#53811	1909 Mission Street, Santa Cruz, CA	May 24, 2022
#23901	1210 Troy Schenectady Rd., Latham, NY	May 26, 2022
#09316	1340 Oyster Point Rd, Newport News, VA	May 31, 2022
#06557	138 S Central Ave, Los Angeles, CA	June 1, 2022
#09835	16806 Georgia Ave., Olney, MD	June 1, 2022
#02367	88 E Broad St, Columbus, OH	June 2, 2022
#00775	3401 Walnut St, Philadelphia, PA	June 3, 2022
#08846	1900 Market St. Philadelphia, PA	June 3, 2022
#09536	600 S 9th St, Philadelphia, PA	June 3, 2022
#25384	3400 Civic Center Blvd, Philadelphia, PA	June 3, 2022
#47631	5964 N Ridge Ave, Chicago, IL	June 3, 2022
#00784	7 Market Square, Pittsburgh, PA	June 6, 2022
#11655	7803 Montvue Center Way, Knoxville, TN	June 6, 2022

STORE	LOCATION	CERTIFICATION DATE
#23154	12911 Factory Lane, Louisville, KY	June 6, 2022
#23642	308 20th St South, Suite 100, Birmingham, AL	June 6, 2022
#02390	1374 W. 6th St, Cleveland, OH	June 7, 2022
#56069	4686 Clemson Blvd., Anderson, SC	June 8, 2022
#10525	3905 Pelham Rd., Greenville, SC	June 10, 2022
#11916	5350 Campbell Blvd A, Nottingham, MD	June 10, 2022
#55069	450 Thompson Creek Road, Stevensville, MD	June 10, 2022
#63059	3009 Millwood Ave. Suite 100, Columbia, SC	June 10, 2022
#07702	874 Commonwealth Ave., Brookline, MA	June 13, 2022
#48827	3704 Silver Lake Rd NE, St. Anthony, MN	June 13, 2022
#00667	1955 41st Avenue, Capitola, CA	June 14, 2022
#10903	1801 Howell Mill Rd, Atlanta, GA	June 14, 2022
#60580	425 Pike St., Seattle, WA	June 14, 2022
#02359	222 S. State St., Ann Arbor, MI	June 15, 2022
#08345	3388 Poplar Ave, Memphis, TN	June 15, 2022
#08793	300 S. Main St., Ann Arbor, MI	June 15, 2022
#11159	5300 Capitol Blvd SE Tumwater, WA	June 15, 2022
#23127	120 South Zeeb Rd., Ann Arbor MI,	June 15, 2022
#07740	1449B New Britain Ave, West Hartford, CT	June 17, 2022
#06392	4465 Centennial Blvd, Colorado Springs, CO	June 21, 2022
#11517	1141 E. Grand River Avenue, East Lansing, MI	June 21, 2022
#54260	131 East Katella Ave., Suite 10, Anaheim, CA	June 21, 2022
#00237	250 Columbine St, Denver, CO	June 23, 2022
#09379	631 W. Northland Ave., Appleton, WI	June 24, 2022
#00793	1400 E Carson St, Pittsburgh, PA	June 27, 2022
#07284	3464 William Penn Hwy, Pittsburgh, PA	June 27, 2022
#10521	5932 Penn Circle South, Pittsburgh, PA	June 27, 2022

STORE	LOCATION	CERTIFICATION DATE
#26676	305 E Mitchell Hammock, Oviedo, FL	June 27, 2022
#07945	3700 S. Kingshighway Blvd, St. Louis, MO	June 28, 2022
#07995	1500 S Lindbergh Blvd, Des Peres, MO	June 28, 2022
#02705	164 E Broadway, Bloomington, MN	June 29, 2022
#02827	1174 E 55th St, Chicago, IL	June 29, 2022
#10407	1128 Walnut St, Philadelphia, PA	June 29, 2022
#14256	2101 W Armitage Ave, Chicago, IL	June 29, 2022
#19311	1570 South Disneyland Dr, Suite 105, Anaheim, CA	June 29, 2022
#02208	401 Vine St, Cincinnati, OH	July 1, 2022
#08358	1544 Piedmont Rd NE #232, Atlanta, GA	July 1, 2022
#28855	814 Iowa St., Bellingham, WA	July 5, 2022
#22002	8 Old Whitmore Ave., Roanoke, VA,	July 6, 2022
#02900	425 Craig Street, Pittsburgh, PA	July 7, 2022
#08742	120 Broadway, Cambridge, MA	July 11, 2022
#02425	1 East Main Street, Madison, WI	July 13, 2022
#07264	3555 West Cary St., Richmond, VA	July 13, 2022
#23129	1017 North Arthur Ashe Blvd, Richmond, VA	July 13, 2022
#50060	3015 Niagara Falls Boulevard, Amherst, NY	July 14, 2022
#10750	9660 Transit Road, East Amherst, NY	July 19, 2022
#11293	121 Cusick Rd, Alcoa, TN	July 19, 2022
#03473	580 Shelburne Road #9, South Burlington, VT	July 22, 2022
#10563	922 Meramec Station Road, Valley Park, MO	July 22, 2022
#27448	135 Talcottville Rd, Vernon, CT	July 22, 2022
#48490	360 Alfred St, Biddeford, ME	July 22, 2022
#63259	1216 Hampton Ave., St. Louis, MO	July 22, 2022
#05658	421 E 400 S, Salt Lake City, UT	July 29, 2022
#10368	3001 North Perryville Road, Rockford, IL	July 29, 2022

STORE	LOCATION	CERTIFICATION DATE
#07625	5310 Liberty Ave., Pittsburgh, PA	August 3, 2022
#22914	563 Baltimore Pike, Bel Air, MD	August 4, 2022
#02618	3093 Mayfield Road, Cleveland Heights, OH	August 5, 2022
#05524	2489 Lenwood Blvd, Barstow, CA	August 5, 2022
#00717	210-21 Southbank Street, Sterling, VA,	August 8, 2022
#10208	11302 Euclid Ave., Cleveland, OH	August 9, 2022
#28174	1231 Veterans Parkway, Clarksville, IN	August 9, 2022
#55230	3241 N. Figueroa St, Los Angeles, CA	August 10, 2022
#05577	6066 W. Olympic Blvd., Los Angeles, CA	August 11, 2022
#19816	7707 McKnight Rd, Pittsburgh, PA	August 11, 2022
#02929	6075 N. Lincoln Ave., Chicago, IL	August 15, 2022
#07363	2303 Nott Street East, Niskayuna, New York	August 15, 2022
#13856	40 South Park St, Montclair, NJ	August 19, 2022
#24961	5122 Edina Industrial Blvd, Edina, MN	August 25, 2022
#09992	4080 Washington Road, McMurray, PA	August 26, 2022
#59412	1025 E Main St., Carbondale, IL	August 26, 2022
#07664	309 Clifton Park Center Road, Clifton Park, NY	August 29, 2022
#57458	7201 Market Street, Wilmington, NC	August 31, 2022
#05406	2224 Shattuck Ave., Berkeley, CA	September 1, 2022
#28845	4655 William Flynn Hwy, Pittsburgh, PA	September 2, 2022
#02209	2305 Fairview Avenue, Roseville, MN	September 8, 2022
#09212	4094 18th Street, San Francisco, California	September 8, 2022
#11728	5655 Pickard Road, Mount Pleasant, Michigan	September 21, 2022
#08804	1703 W. Tennessee Street, Tallahassee, Florida	September 27, 2022
#11064	1 Crossgates Mall Road, B231, Albany, NY	September 27, 2022
#09982	3401 Bardstown Rd, Louisville, Kentucky	October 4, 2022
#06919	2604 11th Avenue, Greeley, CO	October 5, 2022

STORE	LOCATION	CERTIFICATION DATE
#47472	269 Main Street, Westlake, Ohio	October 19, 2022

(c) Since each of the certification dates noted above in paragraph 5(b), beginning on December 17, 2021, based on § 9(a) of the Act, the Union has been the exclusive collective-bargaining representative of each of the Units at Respondent's facilities.

6.

Since on or about December 17, 2021, the Union or one of its joint board affiliates, pursuant to § 9(a) of the Act, has been certified as the exclusive collective bargaining representative of hundreds of separate units of all full-time and regular part-time baristas and shift supervisors in approximately 300 of Respondent's stores around the United States as a result of a nationwide union organizing campaign.

7.

(a) On or about (b) (6), (b) (7)(C) 2022, Respondent, by its (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) during a widely reported on and virtually posted video-recorded interview with the New York Times for its "DealBook DC" policy forum, promised increased benefits at Respondent's U.S. stores, by stating:

And now, a third party is questioning [whether we can build trust with our people and our customers]. And so, the burden of proof is on us and we will demonstrate authentic servant leadership. That's who we have been. And we will – wait, wait for it – we will reinvent – you've asked why I'm coming back – I'm back because we have a responsibility and obligation to reinvent the role and responsibility of our company just as we have for 50 years reinvented the Starbucks experience. And so we have to customize new benefits and we have to demonstrate to our people they can trust us and we have to show up.

(b) On or about (b) (6), (b) (7)(C) 2022, Respondent, by (b) (6), (b) (7)(C) during a widely reported on and virtually posted video-recorded interview with the New York Times for its “DealBook DC” policy forum, informed Respondent’s employees at its U.S. stores that it would be and had been futile for them to select the Union as their collective-bargaining representative, by responding “No” to the interviewer’s question about whether he “could ever see... embracing the Union as part of” the plans quoted above in paragraph 7(a), and further stating that “The primary reason is, we are in business to exceed the expectations of our customers. A hundred million people come into Starbucks. The customer experience will be significantly challenged and less than if a third party is integrated into our business.”

8.

(a) Since on or about the dates set forth opposite each of the facilities identified by store number set forth below in paragraph 8(b), the Union has offered multiple bargaining dates and requested that Respondent provide dates and bargain for an initial first contract bargaining session or sessions.

(b) Since the dates set forth opposite each of the facilities identified by store number set forth below, Respondent has failed and refused to provide and/or delayed in providing the Union with dates for an initial first contract bargaining session or sessions, despite the Union’s multiple offers of bargaining dates and requests for dates from Respondent.

STORE	DATE OF DEMAND TO BARGAIN
#07665	March 23, 2022
#47843	March 27, 2022
#09780	April 7, 2022
#10395	April 21, 2022

STORE	DATE OF DEMAND TO BARGAIN
#11932	April 21, 2022
#65187	April 21, 2022
#07749	May 25, 2022
#07853	May 25, 2022
#08964	May 25, 2022
#49134	May 25, 2022
#65228	May 25, 2022
#07226	June 1, 2022
#00825	June 7, 2022
#07307	June 7, 2022
#23267	June 7, 2022
#29259	June 8, 2022
#47906	June 7, 2022
#22002	July 15, 2022
#00724	August 5, 2022
#07448	August 5, 2022
#00784	August 5, 2022
#07757	August 5, 2022
#00793	August 5, 2022
#02705	August 5, 2022
#02900	August 5, 2022
#06392	August 5, 2022
#07264	August 5, 2022
#07284	August 5, 2022
#07321	August 5, 2022
#07423	August 5, 2022
#07625	August 5, 2022

STORE	DATE OF DEMAND TO BARGAIN
#07702	August 5, 2022
#07856	August 5, 2022
#07857	August 5, 2022
#08345	August 5, 2022
#08358	August 5, 2022
#08395	August 5, 2022
#08552	August 5, 2022
#08742	August 5, 2022
#09316	August 5, 2022
#09379	August 5, 2022
#09835	August 5, 2022
#10521	August 5, 2022
#10563	August 5, 2022
#10750	August 5, 2022
#10903	August 5, 2022
#11118	August 5, 2022
#11293	August 5, 2022
#11655	August 5, 2022
#11685	August 5, 2022
#11715	August 5, 2022
#11916	August 5, 2022
#13674	August 5, 2022
#14168	August 5, 2022
#16439	August 5, 2022
#20587	August 5, 2022
#21922	August 5, 2022
#23129	August 5, 2022

STORE	DATE OF DEMAND TO BARGAIN
#23642	August 5, 2022
#26676	August 5, 2022
#27117	August 5, 2022
#47390	August 5, 2022
#48490	August 5, 2022
#48827	August 5, 2022
#50060	August 5, 2022
#53811	August 5, 2022
#55069	August 5, 2022
#56069	August 5, 2022
#61778	August 5, 2022
#63059	August 5, 2022
#00717	August 12, 2022
#00867	August 12, 2022
#22253	August 12, 2022
#07363	August 19, 2022
#19816	August 19, 2022
#13856	August 24, 2022
#05406	September 30, 2022
#09212	September 30, 2022
#09982	September 30, 2022
#09992	September 30, 2022
#11064	September 30, 2022
#11728	September 30, 2022
#24961	September 30, 2022
#28845	September 30, 2022
#06919	October 7, 2022

STORE	DATE OF DEMAND TO BARGAIN
#08804	October 5, 2022
#10525	October 5, 2022
#22914	October 5, 2022
#57458	October 5, 2022
#47472	October 27, 2022

(c) Since the dates set forth opposite each of the facilities identified by store number set forth below, Respondent has failed and refused to meet and bargain with the Union for a first contract.

STORE	DATE OF DEMAND TO BARGAIN
#07665	March 23, 2022
#47843	March 27, 2022
#09780	April 7, 2022
#10395	April 21, 2022
#11932	April 21, 2022
#65187	April 21, 2022
#03409	May 10, 2022
#27299	May 10, 2022
#10795	May 11, 2022
#25591	May 12, 2022
#07749	May 25, 2022
#07853	May 25, 2022
#08964	May 25, 2022
#49134	May 25, 2022
#07226	June 1, 2022
#00825	June 7, 2022

#07307	June 7, 2022
#47906	June 7, 2022
#23267	June 7, 2022
#11159	June 21, 2022
#22002	July 15, 2022
#00237	August 5, 2022
#00667	August 5, 2022
#00793	August 5, 2022
#00724	August 5, 2022
#00775	August 5, 2022
#00784	August 5, 2022
#02208	August 5, 2022
#02359	August 5, 2022
#02367	August 5, 2022
#02390	August 5, 2022
#02425	August 5, 2022
#02705	August 5, 2022
#02827	August 5, 2022
#02900	August 5, 2022
#03473	August 5, 2022
#05658	August 5, 2022
#07264	August 5, 2022
#07625	August 5, 2022
#08358	August 5, 2022
#08742	August 5, 2022
#05650	August 5, 2022
#06392	August 5, 2022
#06557	August 5, 2022

#07284	August 5, 2022
#07310	August 5, 2022
#07321	August 5, 2022
#07381	August 5, 2022
#07423	August 5, 2022
#07448	August 5, 2022
#07657	August 5, 2022
#07702	August 5, 2022
#07740	August 5, 2022
#07757	August 5, 2022
#07856	August 5, 2022
#07857	August 5, 2022
#07945	August 5, 2022
#07995	August 5, 2022
#08345	August 5, 2022
#08395	August 5, 2022
#08552	August 5, 2022
#08793	August 5, 2022
#08846	August 5, 2022
#08919	August 5, 2022
#09316	August 5, 2022
#09379	August 5, 2022
#09382	August 5, 2022
#09536	August 5, 2022
#09835	August 5, 2022
#10368	August 5, 2022
#10407	August 5, 2022
#10521	August 5, 2022

#10563	August 5, 2022
#10750	August 5, 2022
#10903	August 5, 2022
#11118	August 5, 2022
#11293	August 5, 2022
#11517	August 5, 2022
#11655	August 5, 2022
#11685	August 5, 2022
#11715	August 5, 2022
#11916	August 5, 2022
#13674	August 5, 2022
#14168	August 5, 2022
#14256	August 5, 2022
#16439	August 5, 2022
#19311	August 5, 2022
#20587	August 5, 2022
#21922	August 5, 2022
#23127	August 5, 2022
#23129	August 5, 2022
#23154	August 5, 2022
#23642	August 5, 2022
#23901	August 5, 2022
#23917	August 5, 2022
#25384	August 5, 2022
#26676	August 5, 2022
#27117	August 5, 2022
#27448	August 5, 2022
#28855	August 5, 2022

#47390	August 5, 2022
#47631	August 5, 2022
#48198	August 5, 2022
#48490	August 5, 2022
#48827	August 5, 2022
#50060	August 5, 2022
#53811	August 5, 2022
#54260	August 5, 2022
#55069	August 5, 2022
#56069	August 5, 2022
#60580	August 5, 2022
#61778	August 5, 2022
#63059	August 5, 2022
#00717	August 12, 2022
#00867	August 12, 2022
#02618	August 12, 2022
#05524	August 12, 2022
#05577	August 12, 2022
#22253	August 12, 2022
#55230	August 12, 2022
#63259	August 12, 2022
#02929	August 19, 2022
#07363	August 19, 2022
#19816	August 19, 2022
#13856	August 24, 2022
#02209	September 30, 2022
#05406	September 30, 2022
#07664	September 30, 2022

#09212	September 30, 2022
#09982	September 30, 2022
#09992	September 30, 2022
#10208	September 30, 2022
#11064	September 30, 2022
#11728	September 30, 2022
#24961	September 30, 2022
#28174	September 30, 2022
#28845	September 30, 2022
#59412	September 30, 2022
#08804	October 5, 2022
#10525	October 5, 2022
#22914	October 5, 2022
#57458	October 5, 2022
#06919	October 7, 2022
#47472	October 27, 2022

9.

(a) At various times from on or about January 31, 2022, to the present, Respondent and the Union met for the purposes of negotiating an initial collective-bargaining agreement with respect to wages, hours, and other terms and conditions of employment covering employees at Respondent's facility #07381 located at 933 Elmwood Ave, Buffalo, NY ("Elmwood Unit").

(b) At various times from about March 3, 2022, to present, Respondent and the Union met for the purposes of negotiating an initial collective-bargaining agreement with respect to wages, hours, and other terms and conditions of employment covering

employees at Respondent's facility #23917 located at 4255 Genesee St, Cheektowaga, NY ("Genesee Unit").

(c) During the period described above in paragraph 9(a), Respondent bargained with no intention of reaching agreement regarding the Elmwood Unit by, *inter alia*, insisting upon proposals that are predictably unacceptable to the Union, demeaning and otherwise undermining the Union's chosen representatives, and unduly delaying in responding to information requests submitted by the Union.

(d) During the period described above in paragraph 9(b), Respondent bargained with no intention of reaching agreement regarding the Genesee Unit by, *inter alia*, insisting upon proposals that are predictably unacceptable to the Union, demeaning and otherwise undermining the Union's chosen representatives, and unduly delaying in responding to information requests submitted by the Union.

(e) By its overall conduct, including the conduct described above in paragraphs 9(a) through 9(d), Respondent has failed and refused to bargain in good faith with the Union as the exclusive collective-bargaining representative of the Elmwood and Genesee Units.

10.

By the conduct described above in paragraph 7, Respondent has been interfering with, retraining, and coercing employees in the exercise of the rights guaranteed in § 7 of the Act in violation of § 8(a)(1) of the Act.

11.

By the conduct described above in paragraphs 8 and 9, Respondent has been failing and refusing to bargain collectively with the Union as the exclusive collective-

bargaining representative of its employees in violation of §§ 8(a)(1) and (5) of the Act.

12.

The unfair labor practices of Respondent described above affect commerce within the meaning of §§ 2(6) and (7) of the Act.

WHEREFORE, as part of the remedy for the unfair labor practice allegations alleged above, the General Counsel seeks an Order requiring Respondent to:

(a) electronically distribute any Notice to Employees to all employees who are or have been employed by Respondent since March 23, 2022, by text messaging, e-mail, posting on social media websites, and posting on internal applications, including Partner Hub;

(b) at a meeting or meetings scheduled to ensure the widest possible attendance, have former (b) (6), (b) (7)(C) read both the Notice to Employees and an Explanation of Rights to all employees employed by Respondent on work time in the presence of a Board agent and a representative of the Union, or have a Board agent read the Notice to Employees and an Explanation of Rights to employees employed by Respondent on work time in the presence of a representative of the Union and (b) (6), (b) (7)(C), and that a video recording of the reading of the Notice to Employees and the Explanation of Rights shall be made, with the recording being distributed to employees by electronic means or by mail;

(c) conduct a training session for its managers and supervisors on their obligations under the National Labor Relations Act;

(d) grant Board Agents access to Respondent's facilities and produce records so that the Board Agents can determine whether Respondent has complied with posting,

distribution, and mailing requirements;

(e) grant the Union reasonable access to its bulletin boards and all places where notices to employees are customarily posted;

(f) bargain in good faith with the Union, on request, for the respective periods required by *Mar-Jac Poultry Co.*, 136 NLRB 785 (1962), as the recognized bargaining representative of each of the Units;

(g) adhere to the following bargaining schedule: (1) bargain on request within 15 days of a Board Order; (2) bargain on request for a minimum of 15 hours a week until an agreement or lawful impasse is reached or until the parties agree to a respite in bargaining; (3) prepare written bargaining progress reports every 15 days and submit them to the Regional Director and also serve the reports on the Union to provide the Union with an opportunity to reply; and (4) make whole employee negotiators for any earnings lost while attending bargaining sessions to the extent those earnings were not reimbursed by the Union; and

(h) Reimburse the Union for its costs and expenses incurred in collective bargaining during the period beginning January 31, 2022, including but not limited to any lost wages the Union paid to employee bargaining committee members for bargaining conducted during working hours. Upon receipt of a verified statement of costs and expenses from the Union, Respondent shall promptly submit a reimbursement payment, in the amount of those costs and expenses, to the compliance officer for Region 19 of the National Labor Relations Board, who will document receipt and forward the payment to the Union.

The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to §§ 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the Consolidated Complaint. The answer must be **received by this office on or before May 9, 2023.** Respondent also must serve a copy of the answer on each of the other parties.

The answer must be filed electronically through the Agency's website. To file electronically, go to www.nlr.gov, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. Responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to the Consolidated Complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the

Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the Consolidated Complaint are true.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT, beginning at 9 a.m. on the **19th day of September, 2023**, in a hearing room to be determined in the Jackson Federal Building, 915 Second Avenue, Seattle, Washington, and via the Zoom videoconference platform due to the nationwide breadth of the allegations, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this Consolidated Complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

DATED at Seattle, Washington, this 25th day of April, 2023.



Ronald K. Hooks, Regional Director
National Labor Relations Board, Region 19
915 2nd Ave., Ste. 2948
Seattle, WA 98174-1006

Attachments

Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: www.nlrb.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf.

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at www.nlrb.gov, click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement. The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered in evidence. If a copy of any exhibit is not available when the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the ALJ before the close of hearing. If a copy is not

submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.

**UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
NOTICE**

Cases 01-CA-305952, et al.

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

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**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 19**

STARBUCKS CORPORATION

and

**WORKERS UNITED LABOR UNION
INTERNATIONAL, affiliated with SERVICE
EMPLOYEES INTERNATIONAL UNION**

**Cases 01-CA-305952
02-CA-304557
03-CA-295541
03-CA-295542
03-CA-304496
03-CA-305874
03-CA-308072
03-CA-308087
05-CA-306073
06-CA-304556
06-CA-305945
07-CA-305994
08-CA-305978
09-CA-306006
10-CA-304520
10-CA-305937
12-CA-306060
13-CA-306406
14-CA-305924
15-CA-305997
19-CA-296424
19-CA-297460
19-CA-310293
18-CA-304544
18-CA-306065
20-CA-306021
22-CA-304521
22-CA-305933
25-CA-304571
27-CA-305876
29-CA-304624
32-CA-306196**

**ORDER FURTHER CONSOLIDATING PREVIOUSLY CONSOLIDATED
CASES FOR HEARING AND NOTICE OF CONSOLIDATED HEARING**

An Order Further Consolidating Cases, Second Consolidated Complaint and
Notice of Further Rescheduled Hearing previously issued on March 23, 2023, upon

charges filed by Workers United Labor Union International, affiliated with Service Employees International Union (the “Union”), in Cases 19-CA-296424, 19-CA-297460, and 19-CA-310293, alleging that Starbucks Corporation (“Respondent”) has been engaging in unfair labor practices as set forth in the National Labor Relations Act (the “Act”), 29 U.S.C. § 151 *et seq.* A hearing on that matter is scheduled for September 19, 2023.

A separate Order Consolidating Cases, Consolidated Complaint and Notice of Hearing issued today, upon charges in Cases 01-CA-305952, 02-CA-304557, 03-CA-295541, 03-CA-295542, 03-CA-304496, 03-CA-305874, 03-CA-308072, 03-CA-308087, 05-CA-306073, 06-CA-304556, 06-CA-305945, 07-CA-305994, 08-CA-305978, 09-CA-306006, 10-CA-304520, 10-CA-305937, 12-CA-306060, 13-CA-306406, 14-CA-305924, 15-CA-305997, 18-CA-304544, 18-CA-306065, 20-CA-306021, 22-CA-304521, 22-CA-305933, 25-CA-304571, 27-CA-305876, 29-CA-304624, 32-CA-306196, also filed by the Union against Respondent alleging further unfair labor practices as set forth in the Act. A hearing on that matter has also been scheduled for September 19, 2023.


Having duly considered the matters, and deeming it necessary in order to effectuate the purposes of the Act, and to avoid unnecessary costs or delay, the General Counsel, by the undersigned, pursuant to § 102.33 of the Rules and Regulations of the National Labor Relations Board (the “Board”), ORDERS that these separately consolidated matters are further consolidated for hearing. Accordingly,

IT IS HEREBY ORDERED that Cases 01-CA-305952, 02-CA-304557, 03-CA-295541, 03-CA-295542, 03-CA-304496, 03-CA-305874, 03-CA-308072, 03-CA-308087, 05-CA-306073, 06-CA-304556, 06-CA-305945, 07-CA-305994, 08-CA-305978, 09-CA-

306006, 10-CA-304520, 10-CA-305937, 12-CA-306060, 13-CA-306406, 14-CA-305924, 15-CA-305997, 18-CA-304544, 18-CA-306065, 19-CA-296424, 19-CA-297460, and 19-CA-310293, 20-CA-306021, 22-CA-304521, 22-CA-305933, 25-CA-304571, 27-CA-305876, 29-CA-304624, and 32-CA-306196 be, and hereby are, consolidated for the purposes of hearing, ruling, and a decision by an Administrative Law Judge.

PLEASE TAKE NOTICE THAT, beginning at 9 a.m. on **the 19th day of September, 2023**, in a hearing room to be determined in the Jackson Federal Building, 915 Second Avenue, Seattle, Washington, and via the Zoom videoconference platform due to the nationwide breadth of the allegations, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in the two Consolidated Complaints. The procedures to be followed at the hearing are described in the attached form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

DATED at Seattle, Washington, this 25th day of April, 2023.

A handwritten signature in black ink, reading "Ronald K. Hooks", written over a horizontal line.

Ronald K. Hooks, Regional Director
National Labor Relations Board, Region 19
915 2nd Ave., Ste. 2948
Seattle, WA 98174

Attachments

Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: www.nlrb.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf.

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at www.nlrb.gov, click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement. The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered in evidence. If a copy of any exhibit is not available when the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the ALJ before the close of hearing. If a copy is not

submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
NOTICE

Cases 19-CA-296424, et al.

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

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